### FY 2003 AmeriCorps Guidelines: Questions & Answers

This document provides answers to many frequently asked questions on the 2003 AmeriCorps Program Guidelines. We will periodically supplement this information as we receive additional questions related to the guidelines. Please contact your AmeriCorps Program Officer if you need further assistance.

The frequently asked questions are organized by the following topics:

Capacity Building
Citizenship
Performance Measures
Evaluation
Audit and Financial Information
Application Due Dates/eGrants
Tutoring
Work Study
Homeland Security
Education Award Program

#### **Capacity Building**

### 1. What activities are permitted within capacity building? Is fundraising an appropriate activity?

The language in the FY 2003 guidelines that encourages AmeriCorps members serving in capacity building activities builds on our history and experience in the field. For example, AmeriCorps members actively engaging additional community volunteers results in achieving even more significant accomplishments and helps to build the capacity and sustainability of efforts. The guidelines provide several examples of the types of capacity building activities members might engage in, and we encourage applicants to propose additional activities that would build their organizational capacity to meet community needs.

Until now, the Corporation has, as a matter of policy, limited the extent to which AmeriCorps members could engage in capacity building activities, including fundraising. However, we are now committed to expanding the opportunities for AmeriCorps members, and the projects in which they serve, to participate in many types of capacity building activities. The Corporation plans to issue a proposed rule related to capacity building, including fundraising, by the end of the year, which will set out in more detail, and seek public comment on, the parameters of acceptable activities in this area.

In the meantime, it is our hope that as you prepare your applications, your proposed projects will include creative and exciting ways to achieve independence and sustainability. Until we finalize the regulations on these issues, bear in mind the following parameters: When considering AmeriCorps member activities in the area of

fundraising, make sure that the fundraising activities are tied to the goals of the program you propose. Fund-raising for the organization's overall budget, without being tied to the goals of a specific service program that meets community needs, will not be permitted.

Finally, rest assured that we will not penalize any application whose capacity building or fund-raising activities exceed the parameters of the ultimate regulation on this issue. In fact, your creativity may influence how we draft the final rule. And, to the extent that an activity falls outside the scope of allowable activities in this area, we will work with you to ensure that the activities are permissible prior to issuing the grant.

### 2. Given the emphasis on capacity building, will the 80/20 rule be waived?

(The 80/20 rule currently limits a program's service hours spent in training, education or other non-direct activities to no more than 20% of the members' aggregate service hours.) Service hours that members earn while engaged in capacity building activities will be considered part of the 80%, not the 20%. The 20% relates to training and education for members. Therefore, we feel the 80/20 split does not need to be waived to accommodate the emphasis on capacity building. In addition, several years ago the Corporation revised this grant provision to permit the 80/20 rule to be calculated in the aggregate for the program rather than for each member. We believe this remains the correct course and encourage you to provide us feedback during the coming year based on your experience.

# 3. Must the volunteer recruitment and management component be related to the AmeriCorps service, or can it be part of the broader program of the sponsor?

The volunteer component is preferably connected directly to the primary AmeriCorps service but if it can't be then provide an explanation of why not. In any event, the volunteer component should be included as part of the performance measurement worksheet

#### **Citizenship**

# 1. What technical assistance will the Corporation be providing to implement this activity?

The Corporation has a technical assistance provider currently in place (see our website for details) along with two existing curricula. In the next 4-6 weeks, there will be additional technical assistance and resources indicated on the website. Next spring, we will issue a revised curricula based on the pilot study conducted with many programs this past year. The Corporation will work closely with grantees as we collectively strive for ways to incorporate these important elements into the AmeriCorps experience.

2. The citizenship expectations are going to increase the time spent on AmeriCorps member training – is the 80/20 rule going to be waived?

We are eager to see what the field's experience will be this coming year and believe, at this point, that the 80/20 rule remains a workable policy. We will encourage programs to keep their program officers informed of their experience in meeting the 80/20 split as they incorporate citizenship training.

## 3. Are there different expectations for programs with high school graduates from those recruiting college graduates?

We expect programs to propose citizenship activities that address the goals in the guidelines and which are appropriate for their members.

#### Performance Measures (updated January 24, 2003)

#### 1. What are the requirements for performance measurement?

The Corporation requires all programs to submit at least three performance measures. The performance measures must include at least one output, one intermediate-outcome and one end-outcome. The Corporation recognizes that some programs have been using a performance measurement system for some time and would like to submit more than three measures so that each of the program's major service areas are included. For this reason, we have amended the 2003 AmeriCorps Guidelines to remove the limitation on applicants to submit no more than five performance measures. The amendment to the guidelines is posted on our web site at (insert link to amendment). Applicants may submit three or more performance measures, and can do so in cases where the additional measures provide meaningful and useful information on program performance.

The performance measurement expectations set forth by the Corporation in the amended 2003 AmeriCorps Guidelines describe the minimum requirements to which all AmeriCorps programs must adhere. AmeriCorps programs within a state must contact their state commission to determine if there are additional state performance measurement requirements. A list of state commissions can be found on the Corporation's web site: www.nationalservice.org/about/family/commissions.html.

# 2. What should State Commissions do if they have already selected programs through their grant competition where applicants were not allowed to submit more than five performance measures?

In this case, State Commissions are encouraged to ask selected applicants whether or not there are additional performance measures they would like to include in their application. Again, applicants may submit more than three measures, and can do so in cases where the additional measures provide meaningful and useful information on program performance. However, programs that submit 3 to 5 performance measures as originally requested will not be penalized in the review process.

## 3. If an applicant decides to submit more than three performance measures, are they allowed to submit more than one output?

Yes. Once an applicant has submitted one output, one intermediate-outcome and one end-outcome programs may include additional measures of any type. Programs should submit additional measures only in cases where they provide meaningful and useful information on program performance. Please keep in mind that programs will be held accountable for all measures included in the grant award.

#### 4. Can applicants submit objectives that are NOT performance measures?

No. The Corporation is moving from objectives to performance measures to evaluate the impact of program activities.

#### 5. Where can I get assistance identifying intermediate-outcomes and end-outcomes?

To help programs measure performance, the Corporation and Project STAR have developed a Performance Measurement Toolkit. The toolkit provides several examples of intermediate-outcomes and end-outcomes in different service categories, and includes examples of end-outcomes that can be achieved within the performance period of the grant cycle (typically three years). The Performance Measurement Toolkit is available at <a href="https://www.americorps.org">www.americorps.org</a> and also at <a href="https://www.projectstar.org/star/AmeriCorps/pmtoolkit.htm">www.projectstar.org/star/AmeriCorps/pmtoolkit.htm</a>.

#### 6. What is the time frame for reporting on outputs, intermediate-outcomes and endoutcomes?

The Corporation expects applicants to submit at least one output, one intermediate-outcome and one end-outcome in their application. At a minimum, programs are required to report on outputs at the end of year one; outputs and intermediate-outcomes at the end of year two; and outputs, intermediate-outcomes and end-outcomes at the end of year three. Programs may choose to exceed these minimum requirements and report results when they are available.

#### 7. Do the end-outcomes need to be achieved before the end of the grant cycle?

Yes. The toolkit provides several examples of end-outcomes that can be achieved within the performance period of the grant cycle. Although some long-term end-outcomes may take 10 years or more to accomplish (e.g. reduction in neighborhood poverty), many other end-outcomes can be achieved within a grant cycle (e.g. reduction in school dropout rate, increased civic engagement, improved reading skills, etc.). Programs are encouraged to include a description of their long-term goals in the narrative section of their application. However, programs should only include performance measures that can be achieved during the grant cycle in the performance measurement section of their application.

### 8. What is a logic model? Why should I develop a logic model? Is a logic model a required part of the AmeriCorps application?

The program logic model is a flow chart that provides a concise visual representation of activities that are the core of your program. Each component of a logic model diagram connects to the next component via an "if A then B" sequence of reasoning. Logic modeling can be used during the planning or development of your program to identify the results your program intends to achieve. The logic model below consists of five components.



Inputs: Resources used to produce outputs and outcomes.

Activities: What a program does with the inputs.

Outputs: The products and services delivered (e.g., students tutored, trees planted).

Intermediate Outcomes: Changes that have occurred in the lives of the beneficiaries and/or members, but have fallen short of a significant benefit for them. These may include quality indicators such as timeliness and client satisfaction.

End Outcomes: Changes that have occurred in the lives of beneficiaries and/or members that constitute significant benefits to them.

There are number of advantages to developing a logic model to describe the major service activities of your proposed AmeriCorps program. The logic model will help you:

Communicate your proposed program's potential value.

Clarify the results you are trying to achieve.

Identify the key program elements that must be tracked to assess your program's effectiveness.

Make clear program premises and make visible stakeholder assumptions.

Improve program planning and performance by identifying the ways to measure program success and areas for improvement.

The logic model is not a required part of the AmeriCorps application.

### 9. How can I pay for performance measurement?

We encourage organizations to seek resources for performance measurement from a number of sources. It is our experience that the organizations providing support for your programs expect performance results. With respect to the Corporation, programs may include funds for performance measurement in their application. Program funds that are used for performance measurement are NOT included in administrative expenses, and are not subject to the five percent cap on organizational costs. The five percent cap on

administrative expenses applies to "general or centralized expenses of overall administration of an organization," such as (1) financial, accounting, auditing, contracting, or general legal expenses; (2) internal evaluations of overall organizational management – but not evaluations of a program or project; and (3) general liability insurance. For additional information, see the AmeriCorps regulations, 45 CFR 2510.20, and the AmeriCorps Provisions, 2002, Clause 22.

### 10. How will the Corporation use the information grantees submit on performance measurement?

The Corporation's emphasis on performance measurement is part of a government-wide movement toward greater accountability. In accordance with the Government Performance and Results Act of 1993, all federal agencies are required to develop performance plans and goals for their programs, link those plans and goals to budgeting and funding activities, measure program performance, and report on the results.

The main purpose of performance measurement is to strengthen AmeriCorps programs and foster continuous improvement. Performance measurement allows a program to clarify its purpose and goals, identify how specific services and program components contribute to achieving a desired result, document the actual results and impacts of program activities, and improve program performance by identifying program successes and areas for improvement.

Performance measurement is one of the components the Corporation will consider in making funding decisions for new and continuing funding, and in monitoring the performance of programs. In addition, information on program performance will be included in the Corporation's Annual Performance Report to Congress and in the Office of Management and Budget's (OMB) Program Assessment Rating Tool (PART) review process.

# 11. What should I do if my state commission has different requirements from the Corporation in terms of the number and type of performance measures to report on?

The Corporation's requirements are the minimal requirement; each state commission can incorporate additional requirements in their Request for Proposals (RFP). Consult with your state commission to find out your requirements.

# 12. I am currently funded as an AmeriCorps program and use a variety of data collection tools (instruments). Will I be able to continue using these tools for performance measurement?

Measuring the results of your efforts will require the use of data collection tools, just as tools are needed to collect data for evaluation. In comparing your current objective worksheets to the new performance measurement worksheets, you may notice similarities between the performance measurement worksheet in the new application and your objective worksheet. If your current tools have worked well to collect accomplishment and outcome data for your program's activities, then they may work well for your

performance measures. The instruments you have used to collect accomplishment data will probably work well to collect the output data. There may be a need to adjust your outcome tools to capture the newly defined requirements of intermediate and end outcomes.

### 13. How can I get help in developing performance measures?

The following resources are available to AmeriCorps program applicants who are applying for an AmeriCorps Program Award for the 2003-2004 program year:

- a. *The AmeriCorps Program Applicant Performance Measurement Toolkit*, available from the AmeriCorps page of the Project STAR website, www.projectstar.org/.
- b. Appendix D of the *AmeriCorps Applicant Performance Measurement Toolkit*, lists other web sites and books for suggested reference material.

Project STAR can provide clarification to applicants regarding the Performance Measurement section of the application: <a href="mailto:star@aiweb.com">star@aiweb.com</a> or 1-800-548-3656. Project STAR is a national training and technical assistance (T/TA) provider in performance measurement for the Corporation for National and Community Service.

#### 14. Are any of the performance measures national requirements?

No, performance measures are proposed by the program applicant and if the grant is approved, they will be negotiated as part of the award process. In the guidelines, we do indicate that the Corporation will develop a few performance measures that will apply to all AmeriCorps programs. However, the development of these measures will be conducted in consultation with the field and negotiated with approved applicants. How these national measures affect the total number of performance measures may vary from program to program.

# 15. Do applicants need to have at least one performance measure objective in each of the three categories (needs/service activities, member development, strengthening communities)?

No. Program applicants will need to determine and propose their performance objectives and have them relate directly to the program design. So while you do not need one in each category, they should be in concert with proposed activities (i.e., if the program narrative is mostly about needs and service activities, we would expect to see performance measures related to that). Please note the instruction on the Performance Measurement Worksheet that at least one must be an output measure, one an intermediate outcome measure, and one an end outcome measure.

### 16. Many programs have large numbers of sites engaged in diverse service activities. What is the Corporation's expectation for them?

This is another area the Corporation looks forward to actively working with the field to determine how best to reflect the myriad of activities and yet not dilute the performance measures to the lowest common denominator. We understand that, for some programs, 5

performance measures will not capture all of the program's service activities. That is why we permit applicants to submit more than 5 performance measures. Applicants should discuss their full range of activities in the application narrative and keep in mind that the quality of performance measures is not the only factor used in making funding decisions. Programs should select activities for measurement that best reflect the overall mission of the program and the service activities, and, to the extent possible, develop program-wide measures across similar service activities. The Corporation will have technical assistance materials on its website in 4-6 weeks and will also convene conference calls on performance measurement to help programs address this challenge. Applicants should propose and justify their performance measures, based on their particular circumstances and resources. Performance measure objectives are negotiable during the award process.

### 17. Is "sampling" an acceptable technique for gathering and reporting performance measurement-related data?

Ideally, performance measures should be derived in a way that does not require "sampling". However, if an applicant wants to propose a sampling approach to data gathering and reporting, a detailed justification and plan should be included in the application. We will consider the specific circumstances of the grantee and negotiate the performance measures.

## 18. Some programs consist of mostly 300-hour members – will that be taken into account in the review process?

Yes, we recognize the various models that exist and will clearly consider such factors. Such programs should propose performance measures that are in keeping with their program design.

#### Evaluation (updated January 24, 2003)

### 1. What is the difference between performance measurement and evaluation as defined by the Corporation for National and Community Service?

Performance measurement is an ongoing process, designed to capture progress towards meeting results. Performance measurement is systematic, continuing (at least annual) and internal, that is, usually designed and implemented by the program staff and stakeholders.

The Corporation defines evaluation as in-depth, rigorous studies that measure the particular impact of national and community service programs. While performance measurement and evaluation both include systematic data collection and measurement of progress, evaluation uses scientifically-based research methods to systematically investigate the effectiveness of programs by comparing the observed program outcomes with what would have happened in the absence of the program. Evaluation studies estimate the impacts of programs by comparing the difference between the outcomes for individuals receiving a service or participating in a program to the outcomes for similar individuals not receiving a service or not participating in a program.

## 2. Has the Corporation developed guidance for the requirement that all programs conduct an independent evaluation at least once every four years?

The Corporation is in the process of developing guidance for this requirement. The Corporation does not expect to prescribe a single methodology for evaluation, but rather to identify a set of general guidelines based on generally accepted program evaluation research standards. Although the guidance on evaluations is currently being developed, the general expectations of the Corporation are that the independent evaluations include:

rigorous, systematic, and objective research methods;

procedures to collect reliable and valid data relevant to activities and programs; experimental or quasi-experimental designs in which individuals or programs are compared utilizing appropriate controls to evaluate the effects of the condition of interest, with a preference for random assignment experiments;

procedures to control for the influence of other factors through the use of control or comparison groups so that any changes in outcomes can be attributed to participation in the program;

methods presented in sufficient detail and clarity to allow for replication or, at a minimum, offer the opportunity to build systematically on their findings.

### 3. Where can I get help in developing the independent evaluation?

To assist programs in their evaluation efforts, Project Star has created a User's Guide to Evaluation for National Service Programs, available at <a href="https://www.projectstar.org/star/Library/toolkit.html">www.projectstar.org/star/Library/toolkit.html</a>. Additional assistance for evaluating programs is available from Project Star at <a href="https://www.projectstar.org/star/AmeriCorps/ea\_home.htm">www.projectstar.org/star/AmeriCorps/ea\_home.htm</a>.

In addition, publications from the United Way of America (<a href="www.unitedway.org/outcomes/">www.unitedway.org/outcomes/</a>) and the Kellogg Foundation (<a href="www.wkkf.org/pubs/Pub770.pdf">www.wkkf.org/pubs/Pub770.pdf</a>) provide an overview of outcome-based evaluation, including an introduction to performance measurement, steps for measuring program outcomes, examples of outcomes and outcome indicators for various programs, and the resources needed for measuring outcomes. Programs are also encouraged to review the Evaluation of DC Reads <a href="www.americorps.org/research/dcreads">www.americorps.org/research/dcreads</a> 0100.html.

The Corporation also encourages programs to partner with organizations and individuals in your local area who can provide evaluation assistance. For example, many programs have successfully partnered with local higher-education institutions that are routinely engaged in evaluating the effectiveness of programs.

### 4. How can I pay for an independent evaluation?

Just as with performance measures, we encourage programs to seek evaluation funds from a variety of organizations. With respect to the Corporation, programs may request funds for evaluation in their application. Program funds that are used for evaluations of program performance are NOT included in administrative expenses, and are not subject

to the five percent cap on organizational costs. The five percent cap on administrative expenses applies to "general or centralized expenses of overall administration of an organization," such as (1) financial, accounting, auditing, contracting, or general legal expenses; (2) internal evaluations of overall organizational management – but not evaluations of a program or project; and (3) general liability insurance. For additional information, see the AmeriCorps regulations, 45 CFR 2510.20, and the AmeriCorps Provisions, 2002, Clause 22.

### 5. How should I go about accessing local resources, such as evaluation professionals at colleges and universities?

Local resources can be helpful for program applicants in responding to the performance measurement section of the application. Suggested institutions to contact for assistance include universities/colleges, research firms, or other community organizations that may be using a local resource for their performance measurement/evaluation.

Keep in mind that choosing the "right" local resource that will meet your needs is critical. Identify the specific tasks you would like the local resource to assist you with (e.g., instrument development, data analysis). We recommend that you stay involved in the performance measurement process throughout your program year. In other words, don't pass the entire task of performance measurement to your local resource. You may not get what you need in the end.

The cost of having the local resource assist you is another issue to bear in mind. The cost will depend on the amount of effort you would like the local resource to assume. The more involved you are in your performance measurement, the less your local resource will need to do, reducing costs. One resource that discusses budgeting and planning for an evaluation is:

W.K. Kellogg Foundation. (1998). W. K. Kellogg Foundation Evaluation Handbook. Battle Creek, Michigan: Collateral Management Company.

Chapter Five of this document, on page 54, states, "Generally, an evaluation costs between 5 and 7 percent of a project's total budget." This document also describes a process (and provides a worksheet) for figuring out an appropriate budget for evaluation. This document can be downloaded from <a href="https://www.wkkf.org/pubs/Pub770.pdf">www.wkkf.org/pubs/Pub770.pdf</a>.

### 6. Are state formula applicants required to submit an evaluation, if one is available?

State formula applicants are not required to submit an evaluation to the Corporation. However, the Corporation expects the state commissions to develop a process by which they consider evaluations of formula programs in their funding decisions. The Corporation will ensure states' implementation of this expectation through our monitoring processes.

#### 7. Do program evaluations have to be conducted by an outside evaluator?

We encourage all programs to incorporate evaluation of a program's effectiveness in their program design. This should include engaging an evaluator with expertise in conducting scientifically-based research methods to assess a program's effectiveness. And, evaluation is an allowable grant expense. However, we also recognize that the type of evaluation conducted will vary based on the organization, its resources, program activities, and model. Therefore, there may be evaluation approaches that go beyond data collection to measure progress in achieving outcomes, but that are not conducted by an outside evaluator.

## 8. Must the "four year evaluation" be focused on the CNCS-sponsored activity or may it cover broader programming by the grantee?

For some organizations that combine AmeriCorps service with other resources as part of a larger program, it may be difficult to separate out the AmeriCorps component from the other components of the larger program. In this case, it may be acceptable to evaluate the larger program that includes the AmeriCorps activities. In the case where AmeriCorps activities are part of a larger program but are distinct from the other program components (e.g. AmeriCorps runs the tutoring component of a larger effort to promote the welfare of children), the evaluation should assess the AmeriCorps activities.

# 9. How should programs with many distinct service activities carry out a "rigorous evaluation of program outcomes," which might prove an enormously complicated and expensive undertaking?

For programs with many distinct service activities, programs should select activities for rigorous evaluation that best reflect the overall mission of the program and the service activities carried out. The specific circumstances of the applicant and the program will be considered when evaluating applications.

### 10. If a program evaluation is not available at the time of application submission, will this impact the applicant's score?

As noted in the guidelines, program evaluation is a consideration by the Corporation in reviewing an application. We have always used such information, where available, in reviewing applications for funding.

#### **Audit and Financial Information**

#### 1. Do state formula programs have to submit an audit or financial information?

State formula applicants are not required to submit an audit or financial information to the Corporation. However, the Corporation expects the state commissions to develop a process by which they consider financial information related to formula programs in their funding decisions. The Corporation will ensure states' implementation of this expectation through our monitoring processes.

2. Do large organizations that sponsor AmeriCorps programs (e.g., universities or state agencies) have to submit their most recent audit report with their applications?

Public and private institutions of higher education and state agencies operating AmeriCorps programs do not have to submit a recent audit report or financial information with their application. This requirement applies to all other eligible applicants.

#### **Application Due Dates/eGrants**

### 1. What are the due dates of applications?

The AmeriCorps\*State new competitive applications (including those from recompeting programs) are due March 18, 2003. The state competitive continuations are also due March 18; for AmeriCorps National, the new and recompetes are due April 15 with continuations due July 1. Education Award Program will have due dates of February 11, May 8 and November 5, 2003. AmeriCorps\*State formulas will be July 8 (this will provide sufficient time for those states who wish to put any competitives not funded into their formula portfolio).

#### 2. Is eGrants ready for grantees to access?

It is currently available for state commissions to complete their Administrative Funds, PDAT and Disability Placement applications and for the November 2002 Education Award cycle. Soon the other NOFAs will be available, and an integrated strategy for technical assistance will be posted on our website. For state commissions, many will find it simpler to conduct their outreach and application process on paper and then enter into eGrants only those applicants successful at the state level.

#### **Tutoring**

1. Some programs engaged in tutoring have members in individual placements in a variety of schools involved in many activities including tutoring. How will the No Child Left Behind Act affect them?

The guidelines address the Corporation's expectations with respect to tutoring programs in schools. In addition, we are awaiting final regulations from the Department of Education concerning standards for paraprofessionals in schools, and any applicability to the Corporation's programs. We will provide additional clarity as soon as it is available.

### **Work Study**

1. If a college is not yet meeting the 7% requirement, is it still eligible to apply?

The Corporation takes seriously the U.S. Department of Education's requirement that 7% of Federal Work Study funds be used for community service placements. An institution of higher education that does not meet the minimum should include in its application a discussion of its use of Federal Work Study funds, the reasons for noncompliance, and the steps being taken to resolve the situation. This discussion will be considered in the review of the proposal.

#### **Homeland Security**

# 1. What does it mean now that Homeland Security is an "issue area" rather than a "priority" as it was in the earlier draft of the guidelines?

We continue to believe this is an area where national and community service can play a vital role. Therefore, the Corporation's Board of Directors adopted a resolution making Homeland Security an issue area similar to the existing four (Education, Environment, Public Safety, and Other Human Needs). This provides the flexibility for communities to propose activities they determine are most needed without jeopardizing existing programs operating in other issue areas.

### 2. What is the definition of Homeland Security?

The guidelines define homeland security as, "appropriately engaging citizens and communities in preparedness and response to acts of terrorism and other disasters. Homeland Security includes programs that support public safety, public health, or disaster preparedness and relief." We are focusing the set of activities in this area to be more directly related to terrorism or disasters that breach the security and safety of citizens

#### **Education Award Program**

# 1. Why is the Education Award Program subject to all the new requirements, especially when they receive a maximum of only \$400/FTE?

The Education Award Program continues to be a significant part of the AmeriCorps network that has contributed considerably to the expansion of AmeriCorps at a very modest cost. In 1997 when it was initiated, the intent was to expand and improve the quality of existing community programs. We believe the new key elements in the guidelines build on our collective experience and will continue to improve the quality of national and community service programs. Given the success of the Education Award Program, it has become more competitive as we receive many more applications than there are funds to support. We recognize that particular program models may find it more challenging to address the key elements of these guidelines, and we have specified our intent with respect to the treatment of the Education Award Programs in the supplemental

section of the guidelines. We expect that all applicants will address the key elements in the guidelines and explain, where necessary, if they cannot meet a particular element. Through the application process and our training and technical assistance efforts over the next several months, we will continue to discuss and address these issues with Education Award Programs as well as other types of grantees.